

## UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

•	-
In	L'A.
111	IXC.

John Malone,

Chapter 13 Case No. 24-10885

Debtor

## MOTION TO EXTEND TIME TO FILE SUPPLEMENT TO MOTION FOR SALE

Now comes the Debtor and requests an extension of time for filing his supplement to his Motion for Sale for fourteen days, due to the following:

- 1. Debtor filed a bankruptcy petition on May 8, 2024.
- 2. On April 17, 2025, after a hearing, Debtor was ordered to file a supplement to his Motion for Sale.
- 3. Debtor has met with bankruptcy counsel to review his options including selling with a life estate, selling without a life estate, and a reverse mortgage.
- 4. Debtor has retained a real estate attorney, Andrew Coppo to negotiate a new Purchase and Sale Agreement for him. Attorney Coppo needs additional time to speak with all bidders and enter into the Agreement.

Wherefore, the Debtor requests the Court allow as follows:

- 1. An extension of time to file his supplement to his Motion for Sale until May 22, 2025.
- 2. For such other and further relief as the Court deems just.

Debtor, by his attorney,

Date: May 7, 2025 /s/ John Ullian

John Ullian, Esq. BBO: 542786 Amy Puliafico, Esq. BBO: 682332

The Law Firm of Ullian & Associates, P.C.

220 Forbes Road, Suite 106

Braintree, MA 02184

781-848-5980